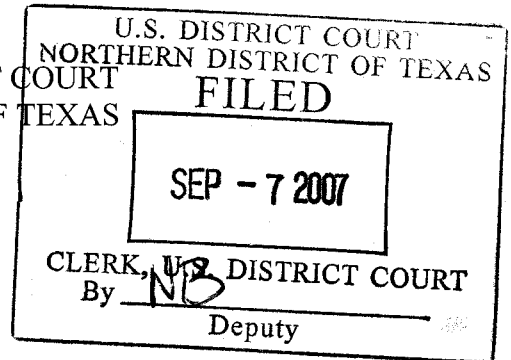


L ✓
ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



REBECCA WILLIAMS,

Plaintiff,

v.

AON CORPORATION,

Defendant.

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§

Civil Action No.: _____

3-07 CV 1530-L

14738

PLAINTIFF'S ORIGINAL COMPLAINT AND JURY DEMAND

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff Rebecca Williams ("Williams") presents her Original Complaint and Jury Demand.

PARTIES

1. Williams is a U.S. citizen and a resident of Dallas County, Texas.
2. Defendant AON Corporation ("AON") is a Delaware Corporation with its principal place of business located at 200 E. Randolph Street, Chicago, Illinois, 60601. AON does not maintain a registered agent in the state of Texas and therefore may be served with process by serving the Secretary of State of Texas, 1019 Brazos St., Austin, TX 78701.

JURISDICTION

3. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1343(a)(4) and 28 U.S.C. § 1337, and supplemental jurisdiction over state claims pursuant to 28 U.S.C. § 1367(a). This is a suit authorized and instituted pursuant to the Civil Rights Act of 1964 and 1991 as amended, 42 U.S.C. § 2000e, et seq. ("Title VII"), 42 U.S.C. § 1981, and it seeks declaratory relief pursuant to 28 U.S.C. §§ 2201 and 2202.

4. This is a proceeding for declaratory judgment, injunctive relief, damages, compensatory damages, punitive damages, attorneys' fees, and other relief to secure the rights of Williams. It is brought to prevent AON from maintaining a policy, practice, custom or usage of discriminating against employees, including Williams, on the basis of race or in retaliation for opposing discriminatory practices.

BACKGROUND FACTS

5. Williams is an African-American who was employed with AON as an Administrative Assistant in the AON Re Services division from March, 2003, to April, 2007.

6. Williams was a good employee who worked hard at her job.

7. Williams was not a troublemaker.

8. Williams was performing duties of a human resource generalist. She was involved in hiring persons into the division.

9. Williams observed that AON discriminated in the hiring of employees in the AON Re Services division. AON refused to consider hiring any person who was female or African-American.

10. Williams expressed her concerns about the discrimination to her superiors and to AON corporate headquarters.

11. AON retaliated against Williams by refusing her advancement within the company, reprimanded her for her comments about discrimination, and created an increasingly hostile work environment.

12. Because of the discrimination and retaliation, Williams filed a charge against AON with the Equal Employment Opportunity Commission.

13. After Williams filed the EEOC charge, AON retaliated further and ultimately terminated her employment.

CAUSES OF ACTION

TITLE VII DISCRIMINATION AND RETALIATION

14. Williams has exhausted required administrative procedures by filing the EEOC Charge, alleging that Williams had been discriminated against by her employer by ultimately terminating Williams's employment because of her race and in retaliation for opposing discriminatory practices. Race or retaliation were at least motivating factors in Williams's harassment and the termination of Williams's employment.

15. The acts, practices, and policies of AON caused damage to Williams in the form of back pay, interest on back pay, front pay, lost benefits and other compensatory damages to which she is entitled under Title VII because of the discriminatory action and retaliation.

42 U.S.C. SECTION 1981

16. AON discriminated against Williams in the making of a contract of employment, including refusing to continue employment on the same terms it offered to non-African-American employees. The refusal was undertaken for the purpose of interfering with and avoiding the rights of Williams and the contractual obligations of AON in violation of 42 U.S.C. § 1981.

17. AON's actions in discriminating against Williams, including discrimination with respect to investigation of claims, retaliation, and termination of employment had a financial impact on Williams, and were intentional acts of racial discrimination in violation of 42 U.S.C. §1981.

18. AON's actions were undertaken for the specific purpose of interfering with and avoiding their contractual obligations and the contractual rights of Williams, in violation of 42 U.S.C. §1981. Race was at least a motivating factor in the harassment of Williams and the termination of her employment.

19. As a result of AON's actions, Williams is entitled to compensatory and punitive damages, as well as reasonable attorneys' fees and expenses.

DECLARATORY ACTION AND INJUNCTIVE RELIEF

20. Williams is entitled to a declaratory judgment, declaring AON's past practices herein complained of to be in violation of Title VII and 42 U.S.C. § 1981. Williams is also entitled equitable relief in the form of an injunction prohibiting AON from engaging in unlawful employment practices, to reinstate Williams with back pay, and reporting on the manner of compliance with the court order.

ATTORNEYS' FEES

21. Williams was required to retain the services of the undersigned attorneys to prosecute the cause. Under Title VII, and Section 1981, Williams is entitled to a reasonable amount for attorney's fees and expenses for all services rendered in this cause, including trials and appeals.

JURY TRIAL

22. Williams requests a trial by jury.


WHEREFORE, Williams requests that upon final trial, Williams have judgment against AON for reinstatement; lost wages and benefits; compensatory, and punitive damages;

attorneys' and expert fees and expenses; injunctive and declaratory relief; interest as provided by law; costs of suit; and any further relief to which Williams may be entitled.

Respectfully submitted,

SHEILS WINNUBST
SANFORD & BETHUNE

BY:


BRIAN P. SANFORD
Texas Bar No. 17630700 ✓

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1701 N. Collins Blvd.
Richardson, Texas 75080
(972) 644-8181
(972) 644-8180

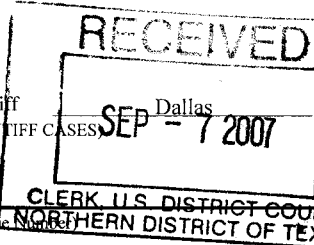
**ATTORNEYS FOR PLAINTIFF
REBECCA WILLIAMS**

JS 44 (Rev. 10/96)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS Rebecca Williams	DEFENDANTS AON Corporation
(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.	
(c) Attorney's (Firm Name, Address, and Telephone Number) Brian P. Sanford, Sheils Winnubst Sanford & Bethune, 1701 N. Collins Blvd., Suite 1100, Richardson, TX 75080; (972) 644-8181	Attorneys (If Known)



3-07CV1530-L

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)	III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)																								
<input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input checked="" type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

V. ORIGIN (Place an "X" in One Box Only)						
<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify)	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION	Brief description of cause: Title VII and Section 1981 Discrimination and Retaliation
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VII. REQUESTED IN COMPLAINT:	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$	CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VIII. RELATED CASE(S) PENDING OR CLOSED	(See instructions): JUDGE	DOCKET NUMBER
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DATE	SIGNATURE OF ATTORNEY OF RECORD
9-7-07	

FOR OFFICE USE ONLY

RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE
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